1 2 3 4 5 6 7	MELINDA HAAG (CABN 132612) United States Attorney THOMAS MOORE (ASBN 4305-078T) Assistant United States Attorney Chief, Tax Division CYNTHIA L. STIER (DCBN 423256) Assistant United States Attorney 11th Floor Federal Building 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102 Telephone: (415) 436-7000 Fax: (415) 436-7009 E-Mail: cynthia.stier@usdoj.gov
8	Attorneys for the Defendants
9 10	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA
11	SAN FRANCISCO DIVISION
12 13	RAFAEL ZAMORA,) Case No. C-13-2186-JST
14	Plaintiff,) STIPULATED REQUEST TO
15	v.) <u>RESCHEDULE AND CONTINUE CASE</u> MANAGEMENT CONFERENCE AND PROPOSEDI OPPER
16	UNITED STATES OF AMERICA,) [PROPOSED] ORDER) Defendant.)
17	
18	IT IS HEREBY STIPULATED AND AGREED AND RESPECTFULLY REQUESTED
19	IT IS HERED I STILLOLATED AND AGREED AND RESIDENT REQUESTED
	by and between the Plaintiff, Rafael Zamora, and Defendant, United States of America, as
	by and between the Plaintiff, Rafael Zamora, and Defendant, United States of America, as
20	by and between the Plaintiff, Rafael Zamora, and Defendant, United States of America, as reflected by the signatures of their respective counsel as set forth below:
20 21	by and between the Plaintiff, Rafael Zamora, and Defendant, United States of America, as reflected by the signatures of their respective counsel as set forth below: The parties are in the process of negotiating a possible resolution of this case. As part of
20 21 22	by and between the Plaintiff, Rafael Zamora, and Defendant, United States of America, as reflected by the signatures of their respective counsel as set forth below: The parties are in the process of negotiating a possible resolution of this case. As part of that process, the parties are requesting a continuation of the case management conference to
20 21 22 23 24	by and between the Plaintiff, Rafael Zamora, and Defendant, United States of America, as reflected by the signatures of their respective counsel as set forth below: The parties are in the process of negotiating a possible resolution of this case. As part of that process, the parties are requesting a continuation of the case management conference to allow them to meet and confer. Any potential settlement in this case entails meetings with the
20 21 22 23 24 25	by and between the Plaintiff, Rafael Zamora, and Defendant, United States of America, as reflected by the signatures of their respective counsel as set forth below: The parties are in the process of negotiating a possible resolution of this case. As part of that process, the parties are requesting a continuation of the case management conference to allow them to meet and confer. Any potential settlement in this case entails meetings with the agency. Additionally, any settlement offer would require approval by the Tax Division in
20 21 22 23	by and between the Plaintiff, Rafael Zamora, and Defendant, United States of America, as reflected by the signatures of their respective counsel as set forth below: The parties are in the process of negotiating a possible resolution of this case. As part of that process, the parties are requesting a continuation of the case management conference to allow them to meet and confer. Any potential settlement in this case entails meetings with the agency. Additionally, any settlement offer would require approval by the Tax Division in Washington, D.C.

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Accordingly, the parties request that the Court continue the case management conference, 1 2 currently scheduled for August 14, 2013, at 2:00 p.m., to October 9, 2013, at 2:00 p.m. 3 4 IT IS SO STIPULATED: 5 /s/ Cynthia Stier CYNTHIA STIER **Assistant United States Attorney** 6 Tax Division 7 8 WENDY ABKIN Counsel for Rafael Zamora 9 10 **ORDER** 11 IT IS ORDERED that the case management conference scheduled for August 14, 2013 at 12 2:00 p.m. is rescheduled to October 9, 2013, at 2:00 p.m. The parties are directed to file a case management statement on September 25, 2013. 13 14 IT IS SO ORDERED Dated: July 23, 2013 15 AS MODIFIED 16 17 ge Jon S. Tigar 18 19 20 21 22 23 24 25 26 27 28

Rafael Zamora v. US, Case No. C-13-2186-JST Stip. to Reschedule Case Mgmt Conf. and [Proposed] Order